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9 Attorney for Plaintiff

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

MARIA CONCEPCION NIETO DE ) Case No. 1:21-cv-00416 BAK (EPG)  
GIANINI, ) STIPULATION AND ORDER FOR  
Plaintiff, ) EXTENSION OF TIME  
(ECF No. 22)  
vs. )  
KILOLO KIJAKAZI, Acting )  
Commissioner of Social Security, )  
Defendant. )  
\_\_\_\_\_  
)

IT IS HEREBY STIPULATED, by and between the parties through their respective  
counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time,  
from May 19, 2022 to June 2, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S  
REPLY BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Plaintiff respectfully states that  
the requested extension is necessary as Plaintiff's Counsel has recently returned to San  
Francisco, California and requires the additional time to ensure the timely submission of briefing  
assignments currently on calendar. Counsel is catching up on past due assignments as she has  
been out of the state for several months due to her father's current health issues. For the week of

1 May 16, 2022 and May 23, 2022 Plaintiff's Counsel has seven merit briefs due and several  
2 EAJA stipulations due. Counsel requires additional time to brief the issues thoroughly for the  
3 Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes  
4 to the Defendant and Court for any inconvenience this may cause.

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7 Respectfully submitted,

8 Dated: May 27, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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10 By: */s/ Dolly M. Trompeter*  
11 DOLLY M. TROMPETER  
12 Attorneys for Plaintiff  
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14 Dated: May 27, 2022 PHILLIP A. TALBERT  
15 United States Attorney  
16 PETER K. THOMPSON  
17 Acting Regional Chief Counsel, Region IX  
18 Social Security Administration  
19  
20 By: *\*/s/ Frederick Fripps*  
21 Frederick Fripps  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on May 27, 2022)  
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## **ORDER**

Based on the above stipulation (ECF No. 22), IT IS ORDERED that Plaintiff shall file Plaintiff's reply no later than June 2, 2022.

IT IS SO ORDERED.

Dated: May 31, 2022

/S/ Eric P. Grujic

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**UNITED STATES MAGISTRATE JUDGE**